



State of Louisiana

Department of Health and Hospitals
Office of the Secretary

December 4, 2017

Samuel Coleman, P.E.
Acting Administrator
USEPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

SAM
Dear Mr. Coleman,

I am writing to request further information on the USEPA (EPA) "ACTION PLAN: DENKA PERFORMANCE ELASTOMER, LLC – PONCHARTRAIN FACILITY (formerly the DUPONT NEOPRENE FACILITY, PONCHARTRAIN WORKS) La Place, Saint John the Baptist Parish, Louisiana, June 2016." As Louisiana's State Health Officer, I have been asked by local community members, as well as local, state and national media outlets to explain EPA's health conclusions of cancer suggested by the content in the Action Plan.

I am specifically requesting your assistance to explain your agency's health conclusions. The impacts of the document are below and your assistance is needed to help us address the complexity related to the health implications referred to in the EPA Action Plan:

- EPA's action plan and its health conclusions are being used as the source document for the national and local news media outlets. "The estimated risks in the area are driven by chloroprene emissions" infers a direct causal link to (any) exposure of chloroprene. "Since November 2015, the EPA has singled out Denka for its chloroprene emissions, saying it gives people who live and work near the plant the highest risk of developing cancer in the nation." ("Air of Uncertainty" WVUE-TV, Ryan Naquin, Nov 22, 2017 at <http://www.fox8live.com/story/33509318/air-of-uncertainty-monday-on-fox-8-news-at-10p>). Your assistance in explaining the direct causal link and an acceptable level of exposure is requested.
- The referenced methodology for scientific modeling is troubling as incidence rates based on census tracts do not lend to statistical strength for causal associations. I would like an explanation of why the results of neither the 10 year LTR cancer incidence review¹ nor the LSUHSC/NCI research study² was reported in the EPA Action Plan since both health studies contained relevant scientific cancer and site specific information that is based on more than mathematical modeling methods based on census tracts. If the EPA Action Plan is making a link to health effects, this seems to contradict earlier statements in the Plan that says "the NATA should only be used to identify areas for further investigation and not to identify actual exposure and associated risks to specific individuals"? How did

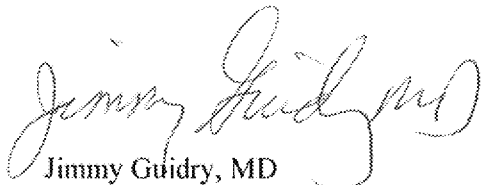
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EPA calculate cancer risk based on census tract information to conclude that the cause was chloroprene?

- EPA's health conclusions extrapolated from a referenced health study conducted in the area are misleading. The Health Section of the EPA Action Plan suggests that because the LDH investigation at the East St. John Elementary School⁴ was inconclusive, this would support a possibility of a link between chloroprene exposure and the ESJE students reported symptoms. These statements are taken out of context as the symptoms at the school are not consistent with any known toxicological effect of chloroprene. The issues at the school may have been related to particulates from grain dust, but no sampling could be performed after the fact. Why would this report be included in an Action Plan for Chloroprene?

The Louisiana Department of Health (LDH) became aware of the EPA Action Plan's existence in October, 2017 when a concerned individual from the community submitted it to LDH for response. Your subject matter expertise and any findings/responses to these questions would certainly be welcomed as we continue to research the EPA health conclusions purported in the Action Plan.

I am hoping that we may work together to address these concerns and clarify the EPA's public health implications in the Action Plan. We hope to move forward in a constructive partnership with EPA and the Louisiana Department of Environmental Quality to protect the health of residents of St John the Baptist parish.



Jimmy Guidry, MD
State Health Officer & Medical Director
Louisiana Department of Health & Hospitals

LDH forwarded several documents mentioned in the Plan to the Region 6 Office of the Agency for Toxic Substances and Disease Registry (ATSDR) in December, 2015 as background information on public health activities in St. John the Baptist parish. The documents included:

¹ A cancer review of the Average Annual Incidence of Major Cancers in St. John the Baptist Parish, Louisiana, and the U.S. between 2003-2012 provided by the Louisiana Tumor Registry (LTR);

² A research article entitled “Environmental Exposure to Emissions From Petrochemical Sites and Lung Cancer: The Lower Mississippi Interagency Cancer Study – a joint effort among the Louisiana State University Health Sciences Center’s (LSUHSC) Schools of Public Health and Medicine and the National Cancer Institute (NCI);

³ An article presented in the Journal of the Louisiana State Medical Society entitled “Prioritization of Louisiana Parishes based on Industrial Releases of Known or Suspected Carcinogens; and

⁴ An LDH Preliminary Health Consult, East St John Elementary School (ESJE), 12/3/2015.